

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

Buc-ee's, Ltd.,

Plaintiff,

v.

**2 Wiseman Enterprises, LLC d/b/a Duckees
Drive Thru,**

Defendant.

Case No. 3:24-cv-05088-RK

The Honorable Roseann A. Ketchmark

Jury Trial Demanded

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

COME NOW, Plaintiff, Buc-ee's, Ltd., by and through its attorneys of record, and Defendant, 2 Wiseman Enterprises, LLC d/b/a Duckees Drive Thru, by and through its attorneys of record, and move the Court for entry of an agreed Protective Order for confidentiality under Rule 26(c) of the Federal Rules of Civil Procedure, which is attached hereto as Exhibit 1. In support of this motion, the parties state as follows:

1. The parties have and will propound discovery requests that the parties believe will require the disclosure of confidential information, including trade secrets and other non-public and confidential technical, commercial, financial and business information.

2. The parties wish to have this information protected from public disclosure. Rule 26(c) provides that the Court, for good cause shown, may issue a protective order, requiring, among other things, that a trade secret or other non-public and confidential technical, commercial, financial and business information be revealed only in a specified way.

3. Good cause exists for entry of a protective order in this case, in that the parties have in good faith negotiated the attached agreed protective order, and believe that this order appropriately protects the confidentiality interests of the parties.

WHEREFORE, the parties request that the Court enter the attached agreed protective order and for any other relief the court deems appropriate.

Dated: March 28, 2025

Respectfully Submitted,

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